

Hearing Aid Compatible Telephones
WT Docket No. 01-309
RM-8658

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Union Telephone Company ("Union") seeks to avail itself of the temporary relief granting HAC status to dual-mode GSM phones through August 1, 2006, as set forth in *Memorandum Opinion and Order*, WT Docket No. 01-309, FCC 05-166, released September 8, 2005 ("GSM Order").

Union also seeks to avail itself of the temporary relief granted to TDMA carriers through September 18, 2006, as set forth in *Order on Reconsideration and Further Notice of Proposed Rulemaking*, WT Docket No. 01-309, FCC 05-122, released June 21, 2005, and codified in amended FCC Rule Section 20.19(c)(2)(i). Union is eligible for TDMA relief because it is conducting a complete overbuild and: (1) offers two hearing aid-compatible handset models to customers that receive service from the overbuilt (*i.e.*, non-TDMA) portion of the network, and makes available in each retail store it owns or operates all of these handset models for consumers to test in the store, (2) is overbuilding its entire TDMA network, and (3) will complete the overbuild by September 18, 2006.

(1) Digital wireless phones tested: Union operates a GSM and TDMA system and acquires wireless telephone handsets manufactured by Nokia and Motorola (collectively, “Vendors”). Union obtains from Nokia hearing aid compatible (HAC) handsets that are rated M3 under standard ANSI C63.19-2005 (“Compliant Phones”). Models tested include 6230 and 6620. Vendors of TDMA handsets are not offering any Compliant Phones.

(2) Laboratory used: Union does not conduct the laboratory testing of handset devices for compliance with the ANSI C63.19 standard. Union relies upon its Vendors to conduct testing and to confirm the compliance of each specific handset device.

(3) Test results for each phone tested: The Compliant Phones deployed by Union have tested positively for M3 compliance in the 1900 MHz band.

(4) Identification of compliant phone models and ratings according to ANSI C63.19: Nokia models 6230 and 6620 are rated M3 under standard ANSI C63.19-2005.

(5) Status of product labeling: Union typically relies upon its Vendors to label all products prior to their shipment to Union’s retail locations. The Compliant Phones offered by Union contain M3 product labeling and additional information.

(6) Outreach efforts: Compliant Phones are being publicly identified for consumers and audiologists. Compliant phones are listed on Union’s web sites, and the information is being communicated to consumer groups. Union trains its retail salespeople regarding which digital wireless phones are compliant. Written materials, pamphlets and other promotional literature are provided at the point of sale, addressing the needs of individuals with hearing disabilities. Union conducts a consumer education program aimed at reaching hearing aid and cochlear implant users. Consumers are given a 30-day trial period within which to try out digital wireless phones to determine whether they will work properly with their hearing aids. Flexible return policies apply to consumers seeking to obtain Compliant Phones. Toward this end, Union has specifically instructed its sales force to make this policy known to consumers, and to assure that the flexible policy is administered to HAC phone users. Additionally, Union conducts outreach activities toward audiologists and hearing aid dispensers who are in a position to inform hearing aid users in advance concerning the immunity of their hearing aids and the degree of likelihood that they will be able to use particular digital wireless phones and services. Current technical and anecdotal information is made available to the public regarding the hearing aid compatibility of Union’s Compliant Phones in the form of handouts from Nokia that are distributed at retail centers and in all communications with the hearing disabilities community.

(7) Retail availability of compliant phones: Compliant Phones are available in all of Union’s retail outlets.

(8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones: Union is in contact with its Vendors with regard to their incorporation of HAC features into future GSM phones. Union is following its Vendors' efforts to provide dual-band GSM handsets that will be hearing aid-compatible in both the 850 MHz band and the 1900 MHz band.

9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order: Union is aware that its Vendors are undertaking to comply with the FCC's GSM Order. Union is ready and willing to offer additional compliant devices to interested customers, and will encourage its Vendors to expedite the availability of advanced handset devices.

(10) Number of compliant and non-compliant phone models offered at this time:
Carrier's core assortment presently includes six (V505, Raxor, 6170, 6620, 6340i, 6230) models of GSM handsets and three (2260, 3560, 6560) models of TDMA handsets. Two of these are Compliant Phones.

(11) Differences in handset offerings among regions in service areas, if any:
There are no differences in handset offerings among regions in Union's service area. Union's handset offerings are presently consistent in all markets.

(12) Ongoing efforts for interoperability testing with hearing aid devices: Union will rely mainly upon its Vendors to conduct interoperability testing of Compliant Phones, and will provide to consumers information about those efforts upon request.